

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ
RICHARD F. ALBERT
ROBERT J. ANELLO*
BENJAMIN S. FISCHER
CATHERINE M. FOTI
CHRISTOPHER B. HARWOOD
LAWRENCE IASON
BRIAN A. JACOBS
TELEMACHUS P. KASULIS
JODI MISHNER PEIKIN
ROBERT M. RADICK*
JONATHAN S. SACK**
EDWARD M. SPIRO
JEREMY H. TEMKIN
RICHARD D. WEINBERG

565 FIFTH AVENUE
NEW YORK, NEW YORK 10017
(212) 856-9600
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

rradick@maglaw.com
(212) 880-9558

SENIOR COUNSEL
PAUL R. GRAND
COUNSEL
JASMINE JUTEAU
CURTIS B. LEITNER
JACOB W. MERMELSTEIN
BRENT M. TUNIS
ROBERT G. MORVILLO
1938-2011
MICHAEL C. SILBERBERG
1940-2002
JOHN J. TIGUE, JR.
1939-2009

*ALSO ADMITTED IN WASHINGTON, D.C.
**ALSO ADMITTED IN CONNECTICUT

June 22, 2021

BY ECF

The Honorable Laura Taylor Swain
Chief United States District Judge
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

The requested extension is granted. DE 49 resolved.
SO ORDERED.

/s/ Laura Taylor Swain Chief USDJ 6/22/2021

Re: United States v. Jonathan Smith, 20 Cr. 317 (LTS)

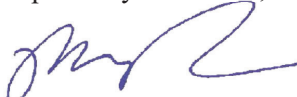
Dear Chief Judge Swain:

On behalf of Jonathan Smith, I respectfully request a brief extension of time for the submission of Mr. Smith's objections to the Presentence Investigation Report ("PSR").

On June 14, 2021, we received the initial draft of the PSR from the Probation Department, and pursuant to Federal Rule of Criminal Procedure 32(f)(1), our objections to the PSR are due on June 28, 2021. In order to prepare those objections, we have scheduled two telephone conferences with Mr. Smith, who is currently incarcerated at the Essex County Jail. However, given that those telephone conferences are not scheduled to occur until Friday June 25 and Tuesday, June 29, 2021, we do not expect to be able to submit our objections prior to the current June 28 deadline. We therefore request four additional days – until July 2, 2021 – for the submission of our objections.

We thank the Court for its consideration of this request.

Respectfully submitted,



Robert M. Radick

cc: Assistant U.S. Attorney Thomas John Wright (by email and ECF)
Kristen M. Santillo, Esq. (by email and ECF)
Probation Officer Christopher F. Paragano (by email)